

Robert T. Mills (Arizona Bar #018853)
Sean A. Woods (Arizona Bar #028930)
MILLS + WOODS LAW, PLLC
5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
Telephone 480.999.4556
docket@millsandwoods.com
swoods@millsandwoods.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Debra Morales Ruiz, an individual, for
herself and on behalf of and as pending
Personal Representative of The Estate of
Alexander Chavez; Alex George Chavez,
an individual,

Plaintiffs,

vs.

County of Maricopa, a governmental
entity; Brandon Smith and Jane Doe
Smith; Paul Penzone and Jane Doe
Penzone; David Crutchfield, an individual;
Lisa Struble, an individual; Kyle Moody
and Jane Doe Moody; Arturo Dimas and
Jane Doe Dimas; Tyler Park and Jane Doe
Park; Gerardo Magat and Jane Doe Magat;
Daniel Hawkins Jr. and Jane Doe
Hawkins; Javier Montano and Jane Doe
Montano; James Dailey and Jane Doe
Dailey; Trevor Martin and Jane Doe
Martin; Greggory Hertig and Jane Doe
Hertig; John Chester and Jane Doe
Chester; Jorge Espinosa Jr. and Jane Doe
Espinosa; Morgan Rainey and John Doe
Rainey; Stefanie Marsland and John Doe
Marsland; and, John and Jane Does 1-40,

Defendants.

No.: CV-23-02482-PHX-KML (DMF)

**JOINT CASE MANAGEMENT
REPORT**

(Assigned to the Honorable Krissa M.
Lanham and referred to the Honorable
Deborah M. Fine)

1 Through counsel undersigned and pursuant to the Court’s “Order Setting Rule 16
2 Case Management Conference” (the “Rule 16 Order”), the parties hereby jointly submit
3 their Joint Case Management Report as follows:
4

5 1. Plaintiffs Debra Morales Ruiz, for herself and on behalf, and as pending
6 Personal Representative of, The Estate of Alexander Chavez Alex George Chavez
7 (collectively, “Plaintiffs”), and Defendants Maricopa County, Brandon Smith, Paul
8 Penzone, David Crutchfield, Lisa Struble, Kyle Moody, Arturo Dimas, Tyler Park, Gerardo
9 Magat, Daniel Hawkins Jr., Javier Montano, James Dailey, Trevor Martin, Gregory Hertig,
10 John Chester, Jorge Espinosa Jr., Morgan Rainey, and Stefanie Marsland (collectively,
11 “Defendants”), attended the Rule 26(f) meeting and assisted in developing the Case
12 Management Report.
13

14 2. Plaintiffs Debra Morales Ruiz, for herself and on behalf, and as pending
15 Personal Representative of, The Estate of Alexander Chavez Alex George Chavez
16 (collectively, “Plaintiffs”), and Defendants Maricopa County¹, Brandon Smith, Paul
17 Penzone, David Crutchfield, Lisa Struble, Kyle Moody, Arturo Dimas, Tyler Park, Gerardo
18 Magat, Daniel Hawkins Jr., Javier Montano, James Dailey, Trevor Martin, Gregory Hertig,
19 John Chester, Jorge Espinosa Jr., Morgan Rainey, and Stefanie Marsland (collectively,
20 “Defendants”) are the parties remaining in the case.
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25 ¹ Though the Court dismissed Maricopa County from this action without prejudice via
26 Order entered August 14, 2025, ECF No. 49, *see id.* 16:27-28, Plaintiffs’ Motion for
27 Reconsideration requesting the County’s reinstatement on the grounds that it is the proper
28 defendant for claims against County Health Services (“CHS”) remains pending, grounds
that Defendants’ Response concedes without conceding that Plaintiff has stated a claim for
relief, *see id.* 2:3-12, ECF No. 55.

1 3. Plaintiffs: This case concerns the death of Plaintiffs' son Alexander Chavez
2 while in the control, custody, and supervision of Maricopa County and its fellow Defendant
3 County employees. Mr. Chavez arrived at the Lower Buckeye Jail (the "Jail") on August
4 5, 2022 and was transported to the hospital on or about August 8, 2022 due to injuries he
5 suffered under Defendants' lack of care in County facilities. He died from these injuries on
6 August 12, 2022.
7

8 Plaintiffs now bring claims against Defendants for: violation of civil rights under
9 the Fourteenth Amendment and 42 U.S.C. § 1983; negligence, and; gross negligence.
10

11 Defendants: This case revolves around the death of Plaintiffs' son decedent
12 Alexander Chavez, who died while in custody at the Maricopa County Jail. Mr. Chavez
13 was booked into the Maricopa County Jail system on August 5, 2022, and was transported
14 to the hospital on or about August 8, 2022, following his attempt to take his own life. Mr.
15 Chavez ultimately passed away from his self-inflicted injuries on August 12, 2022.
16 Defendants exercised appropriate care over Mr. Chavez during his time in the Maricopa
17 County Jails. Defendants deny violation of any federal and/or state laws.
18

19 4. The United States District Court has original jurisdiction of this civil action
20 pursuant to 28 U.S.C. § 1441(c), because Plaintiffs allege violations of their civil rights
21 and have brought claims under 42 U.S.C. § 1983 and the U.S. Constitution.
22

23 5. All remaining Defendants have been served and have appeared.
24

25 6. At present, none of the parties expects to add additional parties to the case.
26 Defendants anticipate filing an amended answer should the Court grant Plaintiff's currently
27 pending Motion for Reconsideration.
28

1 7. At present, no motions are contemplated.

2 8. The parties anticipate private mediation as opposed to the need for a
3 Magistrate Judge for the purposes of a settlement conference.

4 9. The parties are unaware of any related cases pending before other courts or
5 other judges of this Court.

6 10. The parties anticipate that disclosure and discovery in this action will largely
7 involve electronically stored information (“ESI”), which will largely be exchanged
8 between them in .pdf format.

9 11. At present, the parties do not anticipate any issues arising regarding claims
10 of privilege or work product.

11 12. At present, the parties do not believe that an order under Federal Rule of
12 Evidence 502(d) is warranted in this case.

13 13. Discovery:

14 a. Plaintiffs anticipate seeking discovery relating to topics including but not
15 necessarily limited to County records pertaining to the decedent’s treatment in its custody
16 and resulting death, its investigation of same, and its and its employees’ history of
17 treatment of similarly situated individuals.

18 b. Defendants anticipate discovery related to records specific to Correctional
19 Health Services and the Maricopa County Sheriff’s Office. These records are expected to
20 pertain to the care, custody, and control of Mr. Chavez during his incarceration within
21 MCSO’s jails. This will include any records pertaining to Mr. Chavez’s medical status and
22 care, investigation into his death, and MCSO and CHS’ practices and procedures.
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1 c. At present, the parties do not anticipate the need for any changes to the
2 discovery limitations proscribed in the Federal Rules of Civil Procedure.

3 d. The parties believe each deposition in this matter should be limited to **5**
4 hours, and believe each side should be limited to **30** total hours for conducting depositions.
5

6 14. The parties will exchange Initial Disclosure Statements no later than
7 **October 15, 2025.**

8 15. The parties propose the following deadlines, which fall on Friday unless
9 impracticable:
10

11 a. Fact discovery shall be completed no later than **April 30, 2026**

12 b. Plaintiffs shall serve any initial expert disclosures no later than **May 31,**
13 **2026;** Defendants shall serve any initial expert disclosures no later than **June 30, 2026;** the
14 parties shall serve any rebuttal expert disclosures no later than **July 31, 2026;**
15

16 c. Any expert depositions shall be completed no later than **August 31, 2026;**

17 d. The parties shall engage in face-to-face good faith settlement talks no later
18 than **June 30, 2026,** and;
19

20 e. Any dispositive motions shall be filed no later than **September 30, 2026.**

21 16. Plaintiffs have requested a jury trial, and Defendants have not contested that
22 request.

23 17. The parties are hopeful that a private mediation may promote a settlement of
24 this matter.
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1 18. At present, the parties are unaware of any other existing matters that would
2 aid the Court and parties in resolving this case in a just, speedy, and inexpensive manner
3 as required by Federal Rule of Civil Procedure 1.
4

5
6 **RESPECTFULLY SUBMITTED** this 22nd day of September 2025.
7

8 **MILLS + WOODS LAW, PLLC**

9
10 By /s/ Sean A. Woods
11 Robert T. Mills
12 Sean A. Woods
13 5055 N 12th Street, Suite 101
14 Phoenix, AZ 85014
15 Attorneys for Plaintiffs

16 **MARICOPA COUNTY ATTORNEY**
17 CIVIL SERVICES DIVISION

18 By /s/ Courtney R. Glynn (w/ permission)
19 Courtney R. Glynn
20 225 W Madison St.
21 Phoenix, AZ 85003
22 Attorneys for Defendants
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26
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MILLS + WOODS LAW, PLLC
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Phoenix, AZ 85014
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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Courtney R. Glynn
glynnc@mcao.maricopa.gov
RACHEL H. MITCHELL
MARICOPA COUNTY ATTORNEY
CIVIL SERVICES DIVISION
judith.ezeh@mcao.maricopa.gov
christij@mcao.maricopa.gov
rita.kleinman@mcao.maricopa.gov
scottr@mcao.maricopa.gov

225 W Madison St.
Phoenix, AZ 85003

Attorneys for Maricopa County, Dimas, Hawkins, Hertig, Martin, Montano, Moody, Park, Smith, Chester, Rainey, Marsland, Struble, Crutchfield, Magat, Dailey, and the Maricopa County Sheriff

/s/ Ben Dangerfield